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File#

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June 29, 2018

Honorable Barbara Moses, U.S.M.J.
United States Courthouse
500 Pearl Street
New York, N.Y. 10007

RE: Channel One Russia v. Infomir, LLC et als
Civil Action No. 16-cv-1318

Dear Judge Moses:

We are counsel to the defendant, Infomir, LLC, a New York Limited Liability Company. At the June 26, 2018 discovery conference, Your Honor ordered Infomir, LLC to advise, no later than Friday, June 29, 2018, whether Infomir, LLC would retain a forensic computer consultant to image the computer used by plaintiffs' counsel's paralegal, Mr. Vidulich, for the activities described in Mr. Vidulich's various affidavits filed in this action and as referenced in other documents filed by plaintiffs.

Infomir, LLC intends to proceed with the imaging and forensic evaluation. We have engaged Stroz Friedberg, an AON Company for this purpose. Stroz Friedberg will take custody of the subject computer, image it and return the computer to plaintiff's counsel. The imaging will be conducted at Stroz Friedberg's office location at 32 Avenue of the America's, 4th Floor, New York, N.Y. A representative from Stroz Friedberg will coordinate with plaintiffs' counsel's IT Manager, Ms. Tina Carter, whose contact information has been provided to us.

In order to comply with the expedited schedule set by Your Honor for the taking of Mr. Vidulich's deposition, which requires a comprehensive forensic analysis of the imaging in preparation, we have confirmed that Stroz Friedberg is prepared to pick up the computer on Monday, July 2, 2018.

Respectfully submitted,

s/ Stewart M. Leviss
STEWART M. LEVISS

Cc: All counsel